

CONTINUATION OF CRIMINAL COMPLAINT

I, Trisha M.A. Kovac, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent ("SA") of the Federal Bureau of Investigation since February 1, 2009, and am currently assigned to the Detroit Division, Saint Joseph Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography, and regularly assist in the prosecution of these types of cases. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including coercion and enticement and traveler offenses. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. The facts in this continuation come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This continuation is intended to show merely that there is sufficient probable cause that the crimes alleged were committed and for the requested warrant and does not set forth all of my knowledge about this matter.

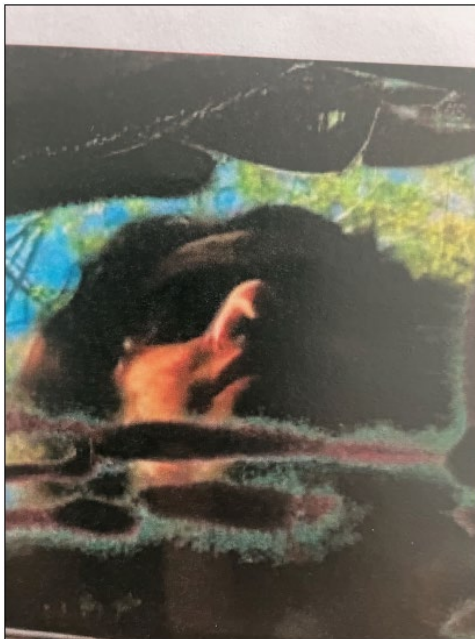
3. Based on my training and experience and the facts as set forth in this continuation, there is probable cause to believe that violations of 18 U.S.C. § 2251(a) (production of child pornography), 18 U.S.C. § 2252A(a)(5)(B) (possession of child

pornography), 18 U.S.C. § 2423(b) (travel with intent to engage in illicit sexual activity), and 18 U.S.C. § 2423(a) (transportation of a minor) have been committed by EDUARDO G. TORRES.

PROBABLE CAUSE

4. On or around April 14, 2023, 11:30 a.m., a woman herein referred to as W.J. contacted the Berrien Springs Oronoko Township Police Department to report that her 12-year-old daughter, herein referred to as J.R., had left the house after W.J. went to work at 5:00 a.m. According to information obtained by J.R.'s sister from J.R.'s Snapchat account, J.R. went to meet a male in his twenties known only as "Jessy" to have sex in the woods for drugs.

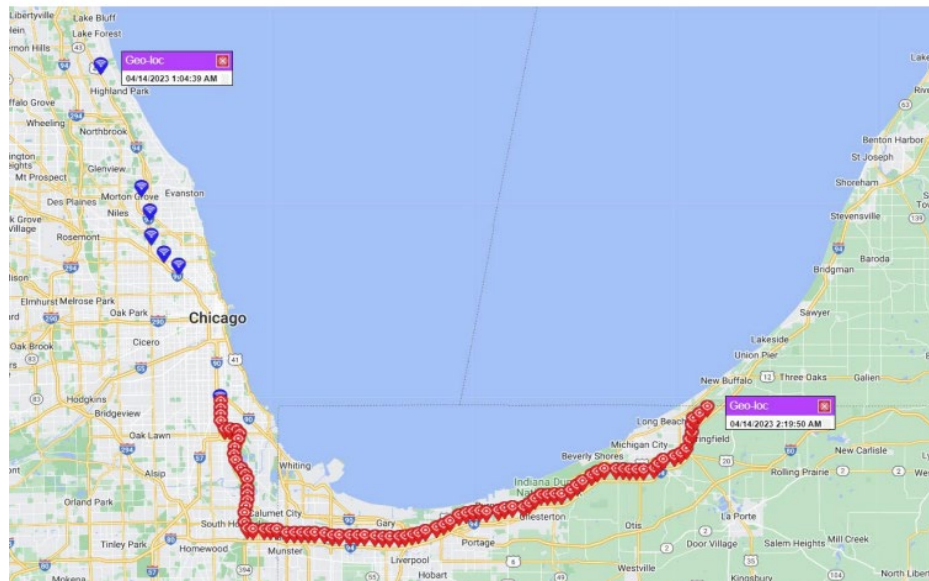
5. Afterward, J.R.'s sister found a video in J.R.'s Snapchat account that showed her having sex with a Hispanic male in the woods. The video had been sent to J.R.'s Snapchat from account "jessy225827" and was shot from the perspective of the male subject. The video at first appeared to be in the "portrait" mode, and the male's face can be seen clearly. The camera view then flips, and a close-up of intercourse of a penis penetrating a vagina is visible, with the male and female in the "doggie-style" position. The female can be seen having her hair pulled while she is in the all fours position from the male vantage point. J.R.'s sister identified the female as J.R. based upon her physical appearance and the shirt she was wearing in the video. A screen capture from the video showed the below subject:



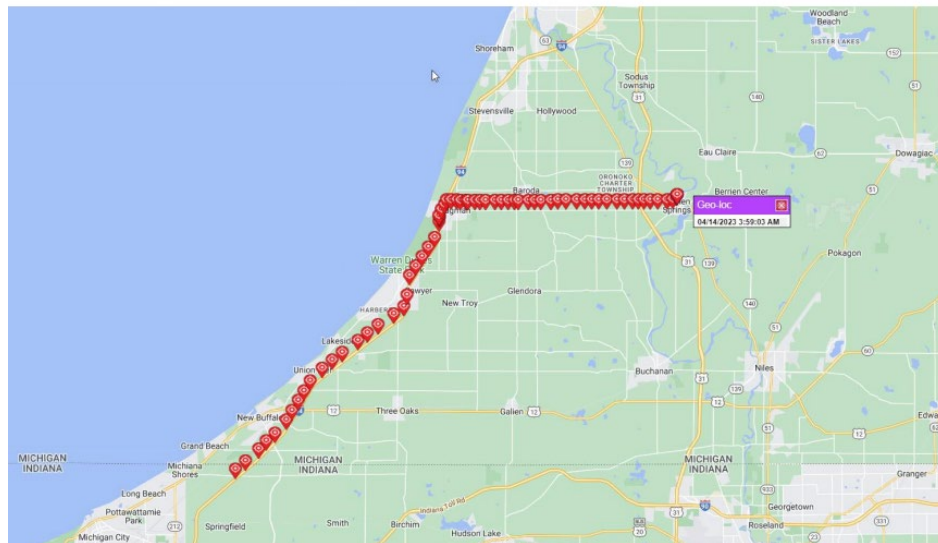
6. An emergency disclosure request to Snapchat for “jessy225827” returned Google email account mtorres.12349@gmail.com and IP logs returning to Verizon Wireless.¹ A search in Accurint for mtorres.12349@gmail.com returned a match for an individual identified as EDUARDO G. TORRES, DOB xx/xx/1997, residential address in Waukegan, IL. An emergency disclosure request submitted to Google, LLC for mtorres.12349@gmail.com requesting all account information, including subscriber and location information, provided location data that indicated that the account had traveled from outside Chicago to Berrien Springs from 1:00 a.m. to 4:00 a.m., spent time at J.R.’s address, and traveled towards Benton Harbor, MI, leaving at approximately 4:00 p.m. ET to return to Chicago, as shown below:

¹ Snapchat is a visual social media messaging application operated by Snap Inc., a company located in Santa Monica, California.

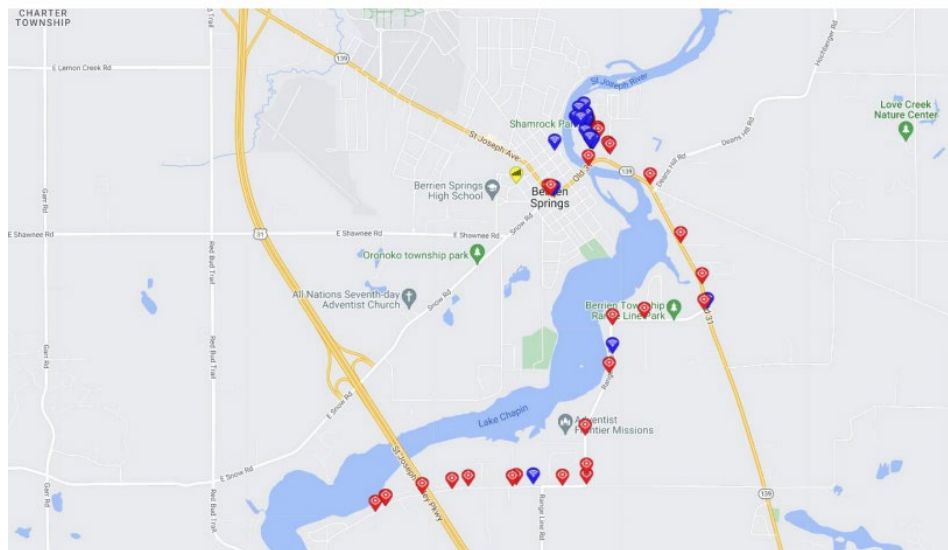
Mtorres.12349@gmail.com
Google Location History
4/14/2023 1:00 AM to 3:00 AM



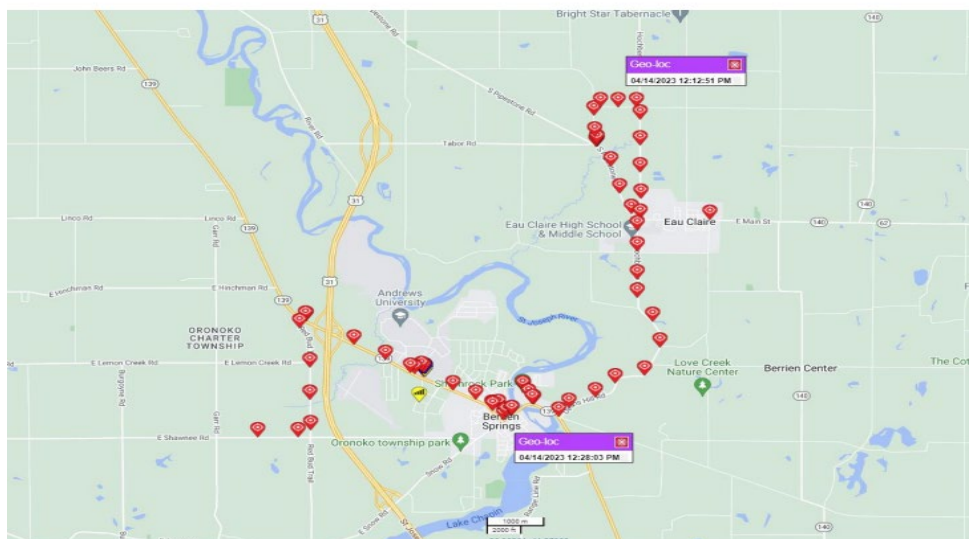
Mtorres.12349@gmail.com
Google Location History
4/14/2023 3:00 AM to 4:00 AM



4/14/2023 4:00 AM to 8:00 AM



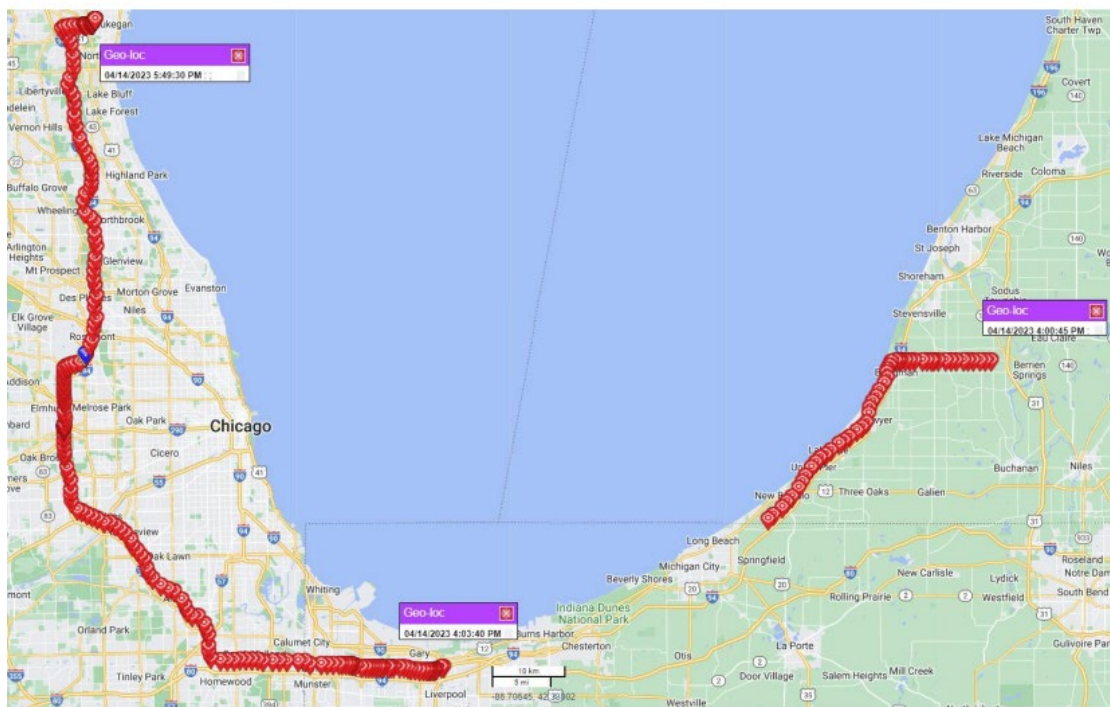
4/14/2023 12:00 PM to 4:00 PM



Mtorres.12349@gmail.com

Google Location History

4/14/2023 4:00 PM to 6:49 PM (EDT)



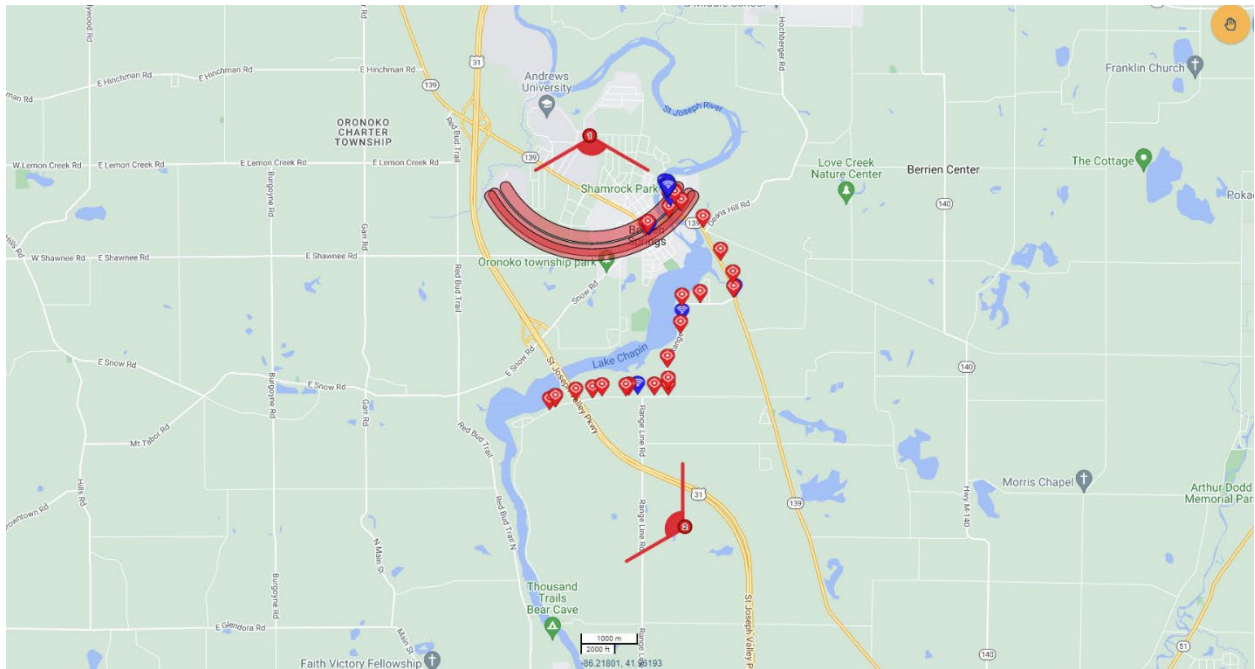
7. Google also returned the following subscriber information:

Eddie Torres
Waukegan, IL
224-406-4664

The listed address in Waukegan is the same address as that in Accurant.

8. An exigent request to Verizon for subscriber information for cellular account number **224-406-4464** associated with EDUARDO G. TORRES both in Accurant and from the Google account information returned information that its subscriber is Maria Torres, at the same address in Waukegan, IL. According to Chicago Department of Motor Vehicles information, her DOB is xx/xx/1969, and therefore, she may be TORRES's mother. Location information provided by Verizon also showed the same path of travel for the Verizon account as the Google account. A combined image of the Verizon and Google data shows both the Google account and

the Verizon account located within the vicinity of J.R.'s residence between 4:00 a.m. and 6:00 a.m.:

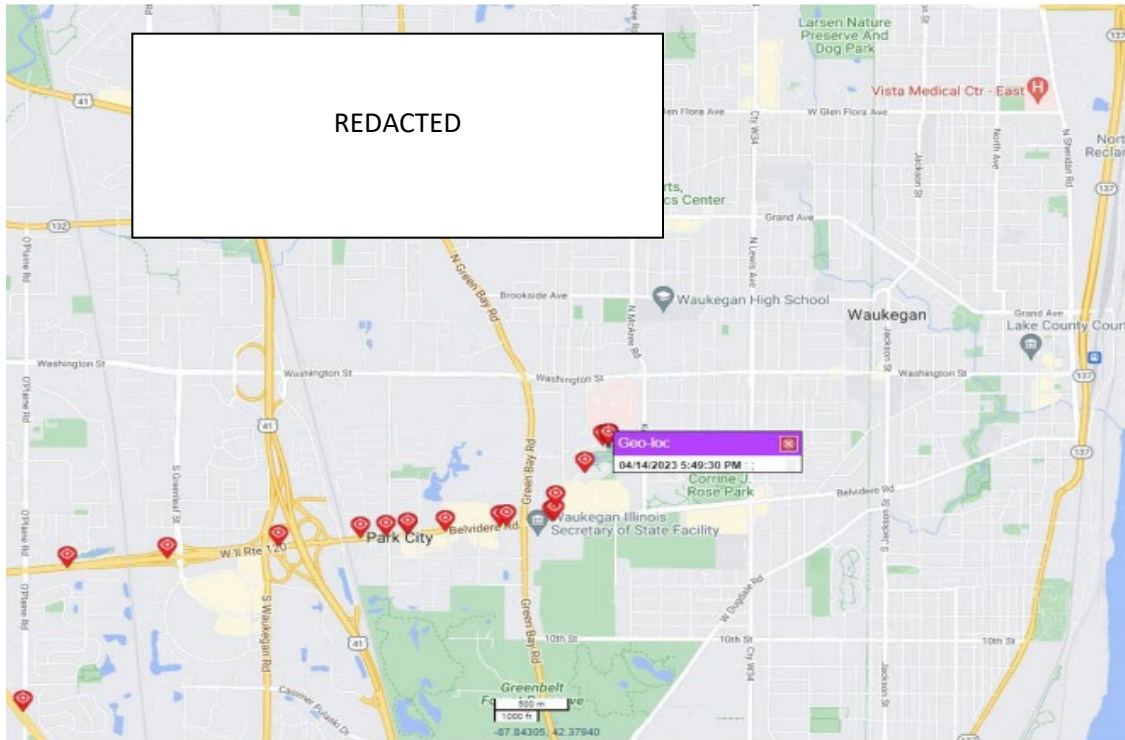


9. As of 6:49 p.m., the Google account gave the following location:

Mtorres.12349@gmail.com

Google Location History

6:49 PM (EDT)



10. An Illinois driver's license for EDUARDO G. TORRES shows an individual of similar appearance to the one from the video:



11. From the late hours of April 14, 2023, to the early morning hours of April 15, 2023, the location information for **224-406-4464** indicated it was within the vicinity of the Waukegan, IL, address described above, associated with EDUARDO G. TORRES. In the early morning hours of April 15, 2023, law enforcement agents approached the residence at that address and observed individuals outside of the residence. TORRES and J.R. were seated in a vehicle in the driveway.

12. Agents called **224-406-4464** and heard the phone ring in TORRES's pocket, which he picked up. Agents read TORRES his Miranda rights and interviewed him. Among other statements, TORRES admitted that he traveled to Michigan to pick up J.R. and that he had sexual intercourse with J.R. once in Michigan and once in the Chicago area. Additionally, TORRES admitted to producing three videos of himself and J.R. having sexual intercourse, which he sent to J.R. over Snapchat. TORRES admitted that he believed that J.R. is 13 years old. TORRES admitted that he had a laptop at the residence on which he had viewed child

sexual abusive materials in the past. Based on the interview and the totality of investigation, TORRES was arrested.

13. Based upon the aforementioned information, I respectfully submit there is probable cause to charge EDUARDO G. TORRES with transportation of a minor and travel with intent to engage in illicit sexual activity in violation of 18 U.S.C. § 2423(a) and (b), respectively, and the production and possession of child pornography in violation of 18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B), respectively.